REMARKS

The Examiner is thanked for the careful examination of the application. However, in view of the foregoing amendment, and the remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

Specification:

In response to the Examiner's request, a new title has been supplied. In the event that the Examiner is not satisfied with the new title, the Examiner is urged to telephone the undersigned attorney so that a new title may be determined.

Art Rejections:

Claims 1, 4, 15, and 16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,133,947, hereinafter Mikuni. Claim 1 defines an image printer system that includes, among other elements, a receiving unit that receives image data, a printing unit that prints out an image based on the received image data, and a saving unit that saves the *received* image data in a recording medium. The system further includes a control unit that begins a printing operation by the printing unit and a data save operation by the saving unit consecutively in case that both operations are instructed before they are begun.

The significance of certain features of the present invention are described on pages 1-3 of the specification. Specifically, on page 3 of the present application, it is described

how image data is frequently corrected or adjusted prior to its printing. The specification further discusses the differences between saving the post-correction image data and the pre-correction image data. It is explained that if the post-correction image data is saved, when an attempt is made later to print the same images using the recording medium on which the image data was saved, it is difficult to print out the original images prior to the image correction. Specifically, the significance of preservation of the original image data would be lost. See page 3, lines 12-20, of the present application.

With regard to the saving unit of claim 1, the Examiner refers to the floppy disk driver 32 illustrated in Figure 5 and described at column 7, lines 21-27, of Mikuni. However, as recognized by the Examiner, the saving operation in Mikuni saves the corrected or "synthesized" image data. It does not save the *received* image data, as set forth in claim 1. Furthermore, Mikuni does not teach or suggest that the saved synthesized image data is reversible, in other words, there is no teaching or suggestion that the received image data, i.e., the pre-corrected image data, can be retrieved. Accordingly, the benefits and advantages set forth on page 3 of the present application are not achievable by the Mikuni device.

In addition, the control unit of claim 1 is defined as beginning a printing operation by the print unit and a data save operation by the saving unit consecutively in case that both operations are instructed before they are begun. However, Mikuni does not teach or suggest a system which is able to receive both the printing and saving operations before they are begun, and then as a result thereof, carry out the printing operation and the data

save operation consecutively. Accordingly, the control unit of claim 1 is also not taught or suggested by Mikuni.

Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claim 1.

Claim 4 depends from claim 1, and is thus also patentable over Mikuni at least for the reasons set forth above with respect to claim 1.

Claim 15 also defines an image printer system that includes, among other elements, receiving image data, instructing a printing operation and a data save operation, printing out an image based on the received image data, and saving the received image data in a recording medium.

As discussed above with respect to claim 1, Mikuni does not teach the step of "saving the received image data in a recording medium." As set forth above, Mikuni saves the reconstructed or synthesized image data, and thus does not enable a user to use the original image data in a subsequent operation. Accordingly, claim 15 is also patentable over Mikuni.

Claim 16 also defines an image printer system that includes, among other elements, a saving unit that saves the received image data in a recording medium. As set forth above with respect to claims 1 and 15, Mikuni does not teach or suggest such a saving unit.

Accordingly, claim 16 is also patentable over Mikuni.

Claims 9-12 and 14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Mikuni and U.S. Patent No. 6,526,158, hereinafter Goldberg.

In expressing the rejection, the Examiner alleges that the saving unit of claim 9 corresponds to the floppy disk driver 32 illustrated in Figure 5 and described at column 7, lines 21-27, of Mikuni. However, as set forth above with respect to claim 1, Mikuni does not teach or suggest a saving unit that saves received image data. The advantages of such a saving unit are explained on page 3 of the present application. The portions of Goldberg relied upon by the Examiner, do not overcome this deficiency of Mikuni. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of claim 9 and dependent claims 10, 11, 12, and 14.

Claims 2-3 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Mikuni as applied to claim 1, and further in view of U.S. Patent No. 6,421,470, hereinafter Nozaki. The Examiner relies upon Nozaki for its alleged teaching of a receiving unit. This feature of Nozaki does not overcome the deficiency of the rejection of claim 1, from which claims 2-3 depend. Accordingly, claims 2-3 are patentable over the combination of Mikuni and Nozaki.

Claim 13 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Mikuni and Goldberg, and further in view of U.S. Patent No. 6,549,295, hereinafter Fantone. The Examiner relies upon Fantone simply for an alleged teaching of applying frequency correction to received image data. Accordingly, Fantone does not overcome the

deficiency of the rejection of claim 9, from which claim 13 depends, based Mikuni and Goldberg. Accordingly, the rejection of claim 13 should also be withdrawn.

Applicants note that several of the cited prior art references are prior art under 35 U.S.C. § 102(e). Accordingly, Applicants reserve the right to predate such rejections at a later time, if necessary and possible.

Furthermore, Applicants have set forth positions distinguishing the prior art over the cited references. With regard to the Examiner's description of the prior art references, Applicants reserve the right to consider and challenge the accuracy of such descriptions at a later time, if necessary and proper.

In view of the foregoing amendments and remarks, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

In the event that there are any questions concerning this Amendment, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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